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U.S. ENVIRONMENTAL PROTECTION AGENCY

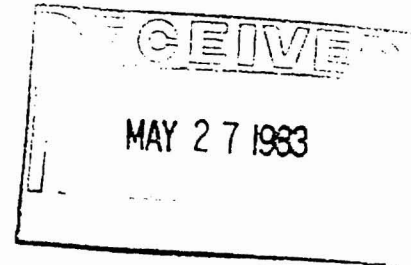
REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO Mail Stop 533
ATTN OF:

MAY 27 1983



Roger Nelson, Vice President
Chem-Security Systems, Incorporated
P. O. Box 1866
Bellevue, Washington 98009

COPY

Dear Mr. Nelson:

In correspondence dated April 15, 1983, signed by Kenneth A. Lepic, Manager, Regulatory Affairs, a Chem-Security Systems, Incorporated (CSSI) proposal for batch testing of liquids containing polychlorinated biphenyls (PCBs) was submitted. The proposal, entitled Attachment D, Protocol for Batch Testing PCB Liquids, has been added to the CSSI Operation Plan, as revised April 30, 1982, under section 12. Unauthorized Waste Placement.

Liquids containing PCB in concentrations at or above 500 parts per million (ppm) must be incinerated or disposed by an alternative method approved by the Environmental Protection Agency (EPA). The dilution of liquids containing PCB at or above 500 ppm subjects the entire volume to the incineration requirement irrespective of the final concentration after dilution. Special Condition (8) of CSSI's March 25, 1982, Letter of Approval prohibits the disposal of any liquids with a concentration of PCB, prior to stabilization, at or above 500 ppm at the facility near Arlington, Oregon.

After review of background information pertaining to the correspondence of April 15, 1983, it has been determined that modification of the March 25, 1982, Letter of Approval for disposal of PCB is necessary.

Part C, Special Condition (8) is hereby revised and amended as follows:

- (8) a) Prior to disposal of liquid contaminated by PCBs, the PCB concentration shall be determined. The basis for this determination must be: i) laboratory analysis by an analytical laboratory participating in EPA's Performance Evaluation Sample Program to determine that the liquid contains less than 500 ppm (0.05 percent) PCB; or ii) a written statement by the generator, signed by a responsible individual (i.e., plant manager, owner) that the liquid contains less than 500 ppm (0.05 percent) PCB along with the technical justification for this determination. The disposal of liquids at or above a concentration of 500 ppm (0.05%) PCB at Chem-Security Systems, Inc., is prohibited. Written records of the PCB concentration determination shall be maintained.

- b) Prior to stabilization of liquids for disposal, a representative sample shall be collected from each portable tank or other containers delivered to the stabilization equipment area. Each of these samples shall be analyzed for PCB concentration (in accordance with (8) a) i)) within 30 days of collection. A written record of analysis results for each sample shall be maintained by Chem-Security Systems and must be available for inspection. Analysis results for each sample must be signed and dated by the individual responsible for the PCB concentration determination. Each sample (and corresponding laboratory analysis) must be recorded in a manner that provides for determining the disposal or storage location of the material sampled. (See Special Condition (37) b) for reporting requirements).

Part C, Special Condition (31) is hereby revised and amended as follows:

- (31) a) No PCB wastes, nor wastes or materials of any kind, shall be placed or disposed of in the northerly 150 feet of Trench 5 or the westerly 200 feet of Trench 9 unless a written record of the placing or disposal of such waste or material is made contemporaneously. The exact location of each waste shall be included in the record with respect to a permanent, surveyed reference monument. The nature of each waste or material, including whether such waste is a PCB mixture, PCB article, PCB container, or PCB equipment, shall also be included in the record. Such records shall also include three-dimensional burial coordinates.
- b) The exact location of each PCB disposal unit (that is, area or trench) at the Arlington facility shall be developed and included in facility records in the form of a survey description and drawing with respect to a permanent surveyed reference monument. The descriptions and drawings shall be submitted to the EPA Region 10 Office by August 31, 1983. Survey descriptions and drawings shall be included in applications for new PCB disposal units. Correction of the survey descriptions (if necessary) for new units shall be submitted to EPA Region 10 within 30 days of final unit construction and prior to use for disposal of PCBs.

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Trench 7

Part C, Special Condition (37) is hereby revised and amended as follows:

(37) a) The operator of the disposal site shall immediately report to the Regional Administrator any detection of PCB in the samples obtained in compliance with the monitoring requirements of Special Conditions (25) and (26) within 48 hours of receiving such information.

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b) If Chem-Security Systems believes, or has reason to believe, that improper disposal or an environmental release of PCBs has or might have occurred at the facility or during transport, the operator of the disposal site shall inform the EPA Region 10 office within 24 hours or by close of business on the next regular business days. A written report of the incident shall be submitted to EPA Region 10 within 2 weeks of the incident or of its initial discovery.

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c) Any chemical accident or personal injury occurring as a result of the disposal of PCB at the Chem-Security Systems facility near Arlington, Oregon, shall be reported to the EPA Region 10 office by close of the next regular business day.

subsequently deleted →

Part C, Special Condition (39) is hereby revised and amended as follows:

(39) a) Access to the disposal site during normal working hours for the purpose of EPA inspections and sampling conducted pursuant to Section 11 of the Toxic Substance Control Act shall not be denied.

b) Access to records required by the regulations (40 CFR Part 761) or by this approval during normal working hours for the purpose of EPA inspections and copying shall not be denied.

Please note that today's modification of the March 25, 1982 Letter of Approval in no way relieves CSSI of the regulatory and approval requirements for proper PCB disposal previously in effect.

Inquiries or correspondence should be directed to George C. Hofer, Chief, RCRA Compliance and Permits Section, U.S. Environmental Protection Agency, Mail Stop 533, 1200 Sixth Avenue, Seattle, Washington 98101, telephone (206) 442-2803.

Sincerely,

L. Edwin Coate

L. Edwin Coate
Acting Regional Administrator